

# EXHIBIT A

RECEIVED & FILED

2019-05-15 PM 2:41

1965-07-11  
MAY 1965  
MAN 124

1 RON BENDER (SBN 143364)  
2 JULIET Y. OH (SBN 211414)  
3 LINDSEY L. SMITH (SBN 265401)  
4 LEVENE, NEALE, BENDER, YOO & BRILL L.L.P.  
5 10250 Constellation Boulevard, Suite 1700  
Los Angeles, California 90067  
Telephone: (310) 229-1234; Facsimile: (310) 229-1244  
Email: RB@LNBYB.com, JYO@LNBYB.com, LLS@LNBYB.com

6 Proposed Attorneys for Tatung Company of America, Inc.

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

10 GOVERNMENT OF PUERTO RICO,  
11 THROUGH ITS ATTORNEY GENERAL  
12 AND JUSTICE OF PUERTO RICO  
WANDA VÁZQUEZ.

13 Plaintiff,

14 | v.

15 LG ELECTRONICS, INC.; LG  
16 ELECTRONICS USA, INC.; LG  
17 ELECTRONICS TAIWAN TAIPEI CO.,  
18 LTD.; KONINKLIJKE PHILIPS  
19 ELECTRONICS NV; LG PHILIPS  
20 DISPLAYS, LTD.; PHILIPS  
21 ELECTRONICS NORTH AMERICA  
22 CORPORATION; PHILIPS  
23 ELECTRONICS INDUSTRIES (TAIWAN),  
24 LTD.; PHILIPS DA AMAZONIA  
25 INDUSTRIA ELECTRONICA LTDA; LP  
26 DISPLAYS INTERNATIONAL, LTD;  
27 SAMSUNG ELECTRONICS CO., LTD;  
SAMSUNG ELECTRONICS AMERICA,  
INC.;  
SAMSUNG SDI AMERICA, INC.;  
SAMSUNG SDI MEXICO SA DE CV;  
SHENZHEN SAMSUNG SDI CO., LTD.;  
TIANJIN SAMSUNG SDI CO., LTD.;  
SAMSUNG SDI (MALAYSIA) SDN.  
BHD.; TOSHIBA CORPORATION;  
TOSHIBA AMERICA CONSUMER

CIV ACTION NO: 3:19-cv-01246

**Removed from:  
Commonwealth of Puerto Rico  
Court of First Instance  
Superior Court of San Juan**

No. 2018CV10381

**NOTICE OF FILING OF PETITION  
FOR RELIEF UNDER CHAPTER 11 OF  
THE UNITED STATES BANKRUPTCY  
CODE, 11 U.S.C. § 101, ET. SEQ., AND  
IMPOSITION OF AUTOMATIC STAY**

1 PRODUCTS, LLC; TOSHIBA AMERICA  
2 INFORMATION SYSTEMS, INC.;  
3 TOSHIBA AMERICA ELECTRONICS  
4 COMPONENTS, INC.; TOSHIBA  
5 DISPLAY DEVICES (THAILAND)  
6 COMPANY, LTD.; PT TOSUMMIT  
7 ELECTRONIC DEVICES INDONESIA;  
8 PANASONIC CORPORATION;  
9 PANASONIC CORPORATION OF NORTH  
10 AMERICA; MATSUSHITA ELECTRONIC  
11 CORPORATION (MALAYSIA) SDN  
12 BHD.; MT PICTURE DISPLAY CO., LTD.;  
13 BEIJING-MATSUSHITA COLOR CRT  
14 COMPANY, LTD.; HITACHI LTD.;  
15 HITACHI AMERICA, LTD.; HITACHI  
16 ASIA, LTD.; SHENZHEN SEG HITACHI  
17 COLORED DISPLAY DEVICES, LTD.;  
18 TATUNG COMPANY OF AMERICA,  
19 INC.;  
20 CHUNGHWA PICTURE TUBES  
21 (MALAYSIA) SDN. BHD.; IRECO GROUP;  
22 JOHN DOE, married to JANE DOE, and  
23 their community property partnership;  
24 CORPORATION XYZ,

Defendants.

17  
18 PLEASE TAKE NOTICE that on September 30, 2019 Tatung Company of America, Inc.  
19 (the "Debtor") filed a voluntary petition under Chapter 11 of Title 11, United States Code, 11 U.S.C.  
20 § 101, et seq. (the "Bankruptcy Code"). The Debtor's bankruptcy case is pending as Case Number  
21 2:19-bk-21521-NB in the United States Bankruptcy Court for the Central District of California, Los  
22 Angeles Division, the Honorable Neil W. Bason, presiding. A true and correct copy of the notice  
23 of bankruptcy filing by the Debtor is attached hereto as **Exhibit "A"** and is incorporated herein by  
24 this reference.

25 Your attention is directed to Bankruptcy Code § 362, which provides for an automatic stay  
26 against:

- 1                 (1) the commencement or continuation, including the issuance or employment of  
 2 process, of a judicial, administrative, or other action or proceeding, including any cross-claims or  
 3 counter-claims against the Debtor that was or could have been commenced before the  
 4 commencement of the case under Title 11; or to recover a claim against the Debtor that arose before  
 5 the commencement of the case under the Bankruptcy Code;
- 6                 (2) the enforcement, against the Debtor or against property of the Debtor's estate, of a  
 7 judgment obtained before the commencement of the case under the Bankruptcy Code;
- 8                 (3) any act to obtain possession of property of the Debtor's estate or of property from  
 9 the estate, or to exercise dominion or control over property of the estate;
- 10                 (4) any act to create, perfect, or enforce any lien against property of the estate;
- 11                 (5) any act to create, perfect, or enforce against property of the Debtor any lien to the  
 12 extent that such lien secures a claim that arose before the commencement of the case under Title  
 13 11;
- 14                 (6) any act to collect, assess, or recover a claim against the Debtor that arose before the  
 15 commencement of the case under Title 11;
- 16                 (7) the setoff of any debt owing to the Debtor that arose before the commencement of  
 17 the case under Title 11 against any claim against the Debtor; and
- 18                 (8) the commencement or continuation of a proceeding before the United States Tax  
 19 Court concerning the Debtor.

20                 The automatic injunction granted by Bankruptcy Code § 362(a) will remain in effect until  
 21 the bankruptcy case is dismissed or closed or until such earlier time as set forth in Bankruptcy Code  
 22 §§ 362(c), (d), (e) and (f).

23                 In addition, please note that actions taken in violation of the stay are void *ab initio* and of  
 24 no effect. *See In re Dunbar*, 245 F.3d 1058 (9th Cir. 2001).

25                 Levene, Neale, Bender, Yoo & Brill L.L.P. is the Debtor's proposed counsel of record in  
 26 the bankruptcy case, and is filing this Notice solely for information purposes only. The filing of this  
 27  
 28

1 Notice is not to be construed or deemed to be an appearance by Levene, Neale, Bender, Yoo & Brill  
2 L.L.P. as counsel of record for any party to the instant action.

3 **NOTICE IS HEREBY GIVEN** that contempt proceedings may be initiated against any  
4 party who participates in any violation of the automatic stay. In addition, the Bankruptcy Court  
5 may award damages to compensate the Debtor for actual loss suffered arising out of a violation of  
6 the automatic stay. *See In re Computer Communications, Inc.*, 824 F.2d 725, 731 (9th Cir. 1987).

7 Dated: November 14, 2019

8 TATUNG COMPANY OF AMERICA, INC.,



9  
10 By:

11  
12 JULIET Y. OH, ESQ.  
13 LEVENE, NEALE, BENDER, YOO  
14 & BRILL L.L.P.  
15 Proposed Attorneys for Debtor and  
16 Debtor-in-Possession

17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28